## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

) Chapter 11
) Case No. 22-11068 (KBO)
) (Jointly Administered)
) Re: D.I. 29929

## DECLARATION OF ADAM J. GOLDBERG REGARDING APPEARANCE OF LATHAM & WATKINS LLP AS COUNSEL TO THE JOINT LIQUIDATORS OF THREE ARROWS CAPITAL, LTD.

- I, Adam J. Goldberg, declare under penalty of perjury that the following is true and correct to the best of my knowledge, information and belief:
- 1. I am a partner in the law firm of Latham & Watkins LLP ("Latham & Watkins"), an international law firm with offices across the United States, Europe, and Asia. I am admitted in, practicing in, and a member in good standing of the state bar of New York, and there are no disciplinary proceedings pending against me. I am over the age of eighteen, am authorized to submit this Declaration, and am competent to testify on the matters contained herein. Latham & Watkins represents Russell Crumpler and Christopher Farmer, in their joint capacities as the duly authorized joint liquidators (the "Joint Liquidators") appointed in the British Virgin Islands' ("BVI") liquidation of Three Arrows Capital, Ltd. (in liquidation) (the "3AC Debtor") and foreign representatives of the 3AC Debtor, as recognized pursuant to chapter 15 of the Bankruptcy Code in the case captioned *In re Three Arrows Capital, Ltd.*, Case No. 22-10920 (MG) (Bankr. S.D.N.Y. 2022) in their capacity as creditors in these chapter 11 cases.
  - 2. Christina Morrison is an attorney who joined the New York office of Latham &

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The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the FTX Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the FTX Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX.

Watkins as an associate on September 8, 2025. Ms. Morrison previously served as a Judicial Law Clerk to the Honorable Karen B. Owens, who is presiding over the Debtors' chapter 11 cases. During her clerkship, Ms. Morrison worked personally and substantially on the above-captioned matter. Ms. Morrison is admitted to practice in Texas and Delaware. Ms. Morrison's admission to practice in New York is pending.

- 3. As required by Rule 1.12 of the Texas Disciplinary Rules of Professional Conduct and Rule 1.12 of the Delaware Lawyers' Rules of Professional Conduct, I am writing to notify the Court and the parties in these cases that all lawyers affiliated with Latham & Watkins have been informed that Christina Morrison has been screened from participating in or discussing this matter, and shall be apportioned no part of the fee earned in connection with our representation of the Joint Liquidators. Specifically, the following procedures have been taken to screen Christina Morrison:
  - a. The central file index to all files, documents, and records in this matter has been marked to indicate that Christina Morrison is to be denied access thereto, and her access to any such electronic files, documents, or records has been electronically restricted in the document management software system;
  - b. A memorandum has been circulated instructing all personnel that Christina Morrison is not to have access to any of the files, documents, or records in this matter, and that Christina Morrison is neither to advise nor consult with any attorney or other person with respect to any aspect of this matter; and
  - c. Christina Morrison will not share in any of the fees for this matter.
- 4. To the extent that any information disclosed in this declaration requires amendment, a further supplemental declaration will be submitted to the Court and interested parties.

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed: September 16, 2025

/s/ Adam J. Goldberg

Adam J. Goldberg Partner Latham & Watkins LLP